

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. THOMAS / ST. JOHN

UNITED STATES OF AMERICA,
Plaintiff,

v.

SIMON ANTHONY PETERS,
Defendant.

CRIMINAL NO. 3:24-mj-00005

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

I, Eric Oram, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Postal Inspector with the US Postal Inspection Service (the "USPIS") assigned to St. Thomas, in the District of the Virgin Islands. I have been a Postal Inspector of the USPIS for approximately sixteen (16) years. I am currently assigned to investigate illegal drug and gun trafficking, mail fraud, mail theft, and crimes occurring on postal property in and around the United States Virgin Islands.

2. The facts stated in this affidavit are based upon my personal knowledge, as well as conversations with other law enforcement personnel and witnesses involved in this investigation. Since the affidavit is being submitted for the limited purpose for establishing probable cause, I have not set forth each and every fact learned during the course of this investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the relief sought herein, they are related in substance and in part, unless otherwise indicated.

3. This affidavit contains information necessary to support probable cause for this

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complaint. This affidavit is not intended to include every fact and matter observed by me or known to the United States Government.

4. This affidavit is made solely for the limited purpose of setting forth probable cause to believe that Simon Anthony Peters did unlawfully threaten employees of the United States Postal Service (“USPS”) in violation of Title 18 United States Code § 875(c).

PROBABLE CAUSE

1. On or about January 27, 2024, a USPS employee received a telephone call at the Ottley Post Office located on St. Thomas, VI. An unidentified male caller (“SUBJECT”) was angry that one of his boxes going to the Kirwan Terrace Housing Community had gone missing. The call was recorded. The subject made the following statements:

- a. “Make sure the fat boy know, we’re watching him and next time we’re going to kill him behind the building.”
- b. “We’ve got three or four men on the case already.”
- c. “So I’m going to make sure I send packages this week, and if any of them go missing... you will see the results.”
- d. “We are definitely going to make a frigging example out here.”
- e. “Any more packages from California go missing, you will see what happen to the co-workers dem... one by one.”
- f. “Your postal inspector working all of dem, you let everyone in the post office know they got a set of man in the Virgin Islands getting ready to start killing all you all... for every box that go missing”

2. USPS employees provided a tracking number that the same subject had inquired about on or about January 20, 2024. The tracking number came back to a USPS parcel with tracking number 9434 6112 0621 0528 1413 52 that had been mailed from Escondido, CA on January 16, 2024 to an apartment at the Kirwan Terrace Housing Community on St. Thomas, VI (PARCEL 1). Agents from Homeland Security Investigations confirmed that PARCEL 1 had been seized by US Customs and Border Protection officers on January 20, 2024. PARCEL 1 had been found to contain marijuana.

3. As a result of the threats, USPS management decided not to send any letter carriers to the Kirwan Terrace Housing Community for two days to ensure their safety. This temporarily disrupted mail delivery to that community.

4. On or about January 29, 2024, while working at the Ottley Post Office, I received notification that the SUBJECT was on the phone. I went to the workroom floor and spoke with the SUBJECT. I recorded the conversation. The SUBJECT stated he wanted to speak to the delivery “driver” for Kirwan Terrace. When asked why he wanted to speak with the driver, the SUBJECT stated, “To let the people know what’s going on in the Virgin Islands. We got people driving around looking for him, and you gon hear him get gun shots in his fucking ass.” The SUBJECT also stated “I’ve been doing this for over 10 years now. I’m in California dealing with the Virgin Islands.”

5. Phone records obtained from the Ottley Post Office indicated that phone number 619-634-4077 (“SUBJECT CELL PHONE”) had called the post office on January 27, 2024, at approximately the same time that the original threats were received. In addition, the SUBJECT CELL PHONE had called the Ottley Post Office phone number on January 29, 2024, at

approximately the same time I spoke with the SUBJECT. The voice of the SUBJECT on both recorded calls sounded like the same person. The SUBJECT had an accent indicative of the Caribbean.

6. Telephone subscriber information was received for the SUBJECT CELL PHONE. The subscriber was listed as Ximon Peter, 708 E 4th Ave, Escondido, CA 92025. The subscriber email address was simon.peters760@gmail.com. The phone had been active since February 2023.

7. Postal records indicated that PARCEL 1 had been tracked by an AT&T Internet Services IP address ("IP ADDRESS"). The subscriber of the IP ADDRESS was listed as Walter Frazier, 14603 Woods Valley Road, Valley Center, CA 92082 ("SUBJECT ADDRESS").

8. On or about February 1, 2024, a police officer from the San Pasqual Indian Reservation in Valley Center, CA drove to the SUBJECT ADDRESS. The officer observed a black Ford sedan at the SUBJECT ADDRESS. The sedan was registered to Simon Peter. Peter was further identified as Simon Anthony Peters ("PETERS"). PETERS' California driver's license lists a home address as that of the SUBJECT ADDRESS. The officer also noted a vehicle registered to Tina Frazier. The officer found a report where Tina Frazier and PETERS were listed as companions when PETERS was issued a traffic citation by San Diego Harbor Police Department on March 21, 2017.

9. The officer noted that PETERS was on the California Sex Offender list. As a sex offender registrant, PETERS had listed his "next of kin" address as, #309 Hospital Grounds, St. Thomas, U.S. Virgin Islands.

10. PETERS had additional criminal history for marijuana trafficking. PETERS' criminal history listed his place of birth as Trinidad and Tobago. A booking photo of PETERS was obtained.

11. PARCEL 1 had a return address of 342 W 15th Ave, Unit 5, Escondido, CA 92025 ("RETURN ADDRESS"). A Public records search for PETERS indicated he had been associated with 342 W 15th Ave, Unit 11, Escondido, CA 92025 in the past.

12. Postal records indicated that the mailing label on PARCEL 1 had been created at the Postal Annex, a private mailing and shipping store, located at 1637 E Valley Parkway, Escondido, CA 92027. Mailing records were obtained from the Postal Annex showing that multiple parcels had been mailed from that location to St. Thomas, U.S. Virgin Islands. All of them had the same RETURN ADDRESS.

13. On December 9, 2023, a USPS parcel with tracking number 9505 5130 8588 3343 7111 04 (PARCEL 2) was mailed from Escondido, CA to an address in Doral, FL. An image of the parcel was obtained. The return address was listed as Anthony Peters, 340 W 15th Ave, Escondido, CA 92025. Surveillance video was obtained from the Escondido Post office for the date and time of the mailing of PARCEL 2. The video shows a black male mailing PARCEL 2. The man resembles the booking photo of PETERS.

14. On February 7, 2024, a tracking warrant for the SUBJECT CELL PHONE was authorized by Honorable Magistrate Judge Ruth Miller in the District of the Virgin Islands. The warrant authorized real-time tracking as well as historical cell site information.

15. A review of the historical location data showed that the SUBJECT CELL PHONE was within 100 - 200 meters of the Postal Annex store at approximately the same time PARCEL 1 was mailed.

16. On January 27, 2024, the same day that the first threat call was made to the Ottley Post Office, the SUBJECT CELL PHONE was within 100 - 200 meters of the SUBJECT ADDRESS.

17. Based on the above information, I believe there is probable cause that SIMON ANTHONY PETERS did unlawfully threaten employees of the United States Postal Service ("USPS") in violation of Title 18 United States Code § 875(c).

Respectfully submitted,



Eric Oram
Postal Inspector
US Postal Inspection Service

Sworn to before me and subscribed in my presence on February 12, 2024, at St. Thomas, U.S. Virgin Islands.



Honorable Ruth Miller
United States Magistrate Judge